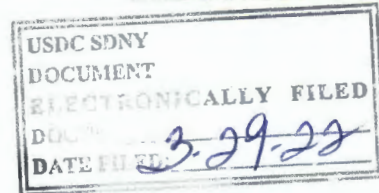


EXECUTION COPY



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE  
KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to case no. 18-cv-09492.

MASTER DOCKET

18-md-2865 (LAK)

**PROPOSED CONSENT JUDGMENT**

WHEREAS, on June 14, 2018, plaintiff Skatteforvaltningen ("SKAT") commenced this action against defendants Tew, LP Retirement Plan ("Tew LP") and Vincent Tew, and on April 24, 2020, SKAT filed an amended complaint against the defendants (the foregoing collectively hereinafter referred to as the "Action");

WHEREAS, SKAT and defendant Tew LP now wish to resolve all the claims SKAT asserted in the Action against Tew LP;

NOW THEREFORE, without trial or adjudication of issue of fact or law, and upon Tew LP's consent, the Court finds that there is good and sufficient cause to enter this Consent Judgment, and that IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

1. This Consent Judgment is hereby entered in favor of plaintiff SKAT against defendant Tew LP in the amount of \$2,425,000 (US); and
2. Defendant Tew LP shall be liable to pay the amount set forth in paragraph 1.
3. Each party shall bear its own attorneys' fees and costs.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Consent Judgment.

**EXECUTION COPY**

Dated: New York, New York  
June 7, 2021

By: 

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*Counsel for Plaintiff Skatteforvaltningen  
(Customs and Tax Administration of the  
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By: \_\_\_\_\_

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*Counsel for Tew LP, Retirement Plan*

SO ORDERED:

\_\_\_\_\_  
Lewis A. Kaplan  
United States District Judge

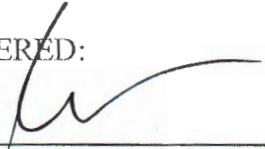
June 7, 2021

By: \_\_\_\_\_

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*Counsel for Plaintiff Skatteforvaltningen  
(Customs and Tax Administration of the  
Kingdom of Denmark)*

SO ORDERED:

  
\_\_\_\_\_  
Lewis A. Kaplan  
United States District Judge

By:  \_\_\_\_\_

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3/29/22